

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**(01) MATTHEW D. CEPLECHA a.k.a.
“SHIPWRECK”,**
[DOB: 10-07-1985],

(02) JESSIE R. THOMAS,
[DOB: 12-23-1980],

(03) LUCAS W. HAYNES,
[DOB: 05-27-1987],

**(04) ANTHONY J. KUREK, a.k.a.
“BONES”,**
[DOB: 08-01-1966],

(05) JEREMY S. RUSSELL,
[DOB: 01-13-1987],

(06) HOLLI S. LAROSE,
[DOB: 12-17-1986],

(07) PHILLIP D. ROGERS,
[DOB: 09-16-1975],

(08) JESSICA A. RALLS,
[DOB: 07-04-1986],

and

(09) JESSY K. SANCHEZ,
[DOB: 07-03-1983],

Defendants.

No.

COUNT 1

21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 846
NLT 10 Years Imprisonment
NMT Life Imprisonment
NMT \$10 Million Fine
NLT 5 Years Supervised Release
Class A Felony

COUNTS 2, 5, 6, 11, and 15

21 U.S.C. § 841(a)(1) and (b)(1)(C)
NMT 20 Years Imprisonment
NMT \$1 Million Fine
NLT 3 Years Supervised Release
Class C Felony

COUNTS 3, 8, and 12

18 U.S.C. § 924(c)(1)(A)
NLT 5 Years Imprisonment
(consecutive to Count 1)
NMT Life Imprisonment
NMT \$250,000 Fine
NMT 5 Years Supervised Release
Class A Felony

COUNTS 4 and 9

18 U.S.C. §§ 922(g)(1) and 924(a)(2)
NMT 10 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class C Felony

COUNT 7

21 U.S.C. § 841(a)(1) and (b)(1)(A)
NLT 10 Years Imprisonment
NMT Life Imprisonment
NMT \$10 Million Fine
NLT 5 Years Supervised Release
Class A Felony

Defendants/Counts:

(01) Ceplecha: 1
(02) Thomas: 1, 10, 14, and 15
(03) Haynes: 1, 7-9, and FA
(04) Kurek: 1, 3, 4, and FA
(05) Russell: 1 and 10-12
(06) Larose: 1, 5, and FA
(07) Rogers: 1 and 6
(08) Ralls: 1 and 2
(09) Sanchez: 1 and 13

COUNT 10

21 U.S.C. §§ 841(a)(1) and (b)(1)(A) and 846
18 U.S.C. § 2
NLT 10 Years Imprisonment
NMT Life Imprisonment
NMT \$10 Million Fine
NLT 5 Years Supervised Release
Class A Felony

COUNTS 13 and 14

21 U.S.C. § 841(a)(1) and (b)(1)(B)
NLT 5 Years Imprisonment
NMT 40 Years Imprisonment
NMT \$5,000,000 Fine
NLT 4 Years Supervised Release
Class B Felony

FORFEITURE ALLEGATION

21 U.S.C. § 853

\$100 Special Assessment (Each Count)

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Distribute 500 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 846

Beginning on an unknown date, but at least as early as October 1 2019, and continuing to on or about February 25, 2020, said dates being approximate, in Greene County, in the Western District of Missouri, and elsewhere, the defendants, **MATTHEW D. CEPLECHA a.k.a. “SHIPWRECK”, JESSIE R. THOMAS, LUCAS W. HAYNES, ANTHONY J. KUREK a.k.a. “BONES”, JEREMY S. RUSSELL, HOLLI S. LAROSE, PHILLIP D. ROGERS, JESSICA A. RALLS, and JESSY K. SANCHEZ**, knowingly and intentionally conspired and agreed with each other and with others, known and unknown to the Grand Jury, to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a

Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A), all in violation of Title 21, United States Code, Section 846.

COUNT 2

(Distribution of a Mixture or Substance Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about October 16, 2019, in Greene County, in the Western District of Missouri, the defendant, **JESSICA A. RALLS**, knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 3

(Possession of Firearms in Furtherance of Drug Trafficking Crime)
18 U.S.C. § 924(c)(1)(A)

On or about October 23, 2019, in Greene County, in the Western District of Missouri, the defendant, **ANTHONY J. KUREK a.k.a. "BONES"**, did knowingly possess firearms, to wit: (1) a Phoenix Arms, HP22A, .22 caliber semi-automatic pistol, bearing serial number 4510650; (2) a Taurus, Curve, .380 caliber semi-automatic pistol, bearing serial number 1D146683; and (3) a Colt, Detective Special, .38 caliber revolver, bearing serial number A13034, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, as alleged in Count 1, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 4

(Possession of Firearms by Prohibited Person)
18 U.S.C. §§ 922(g)(1) and 924(a)(2)

On or about October 23, 2019, in Greene County, in the Western District of Missouri, the defendant, **ANTHONY J. KUREK a.k.a. "BONES"**, then knowing he had previously been

convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms, to wit: (1) a Phoenix Arms, HP22A, .22 caliber semi-automatic pistol, bearing serial number 4510650; (2) a Taurus, Curve, .380 caliber semi-automatic pistol, bearing serial number 1D146683; and (3) a Colt, Detective Special, .38 caliber revolver, bearing serial number A13034, and the firearms were in and affecting interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 5

(Possession with Intent to Distribute a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about December 11, 2019, in Greene County, in the Western District of Missouri, the defendant, **HOLLI S. LAROSE**, knowingly and intentionally possessed, with intent to distribute, any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 6

(Possession with Intent to Distribute a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about December 11, 2019, in Greene County, in the Western District of Missouri, the defendant, **PHILLIP D. ROGERS**, knowingly and intentionally possessed, with intent to distribute, any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 7

(Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)

21 U.S.C. § 841(a)(1) and (b)(1)(A)

On or about December 25, 2019, in Greene County, in the Western District of Missouri, the defendant, **LUCAS W. HAYNES**, knowingly and intentionally possessed, with intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT 8

(Possession of Firearms in Furtherance of Drug Trafficking Crime)

18 U.S.C. § 924(c)(1)(A)

On or about December 25, 2019, in Greene County, in the Western District of Missouri, the defendant, **LUCAS W. HAYNES**, did knowingly possess firearms, to wit: (1) a Glock, 19 Gen 4, 9mm semi-automatic pistol, bearing serial number BHKM793; (2) a Glock, 22, .40 caliber semi-automatic pistol, bearing serial number MCSD322; and (3) a Ruger, P90DC, .45 caliber semi-automatic pistol, bearing serial number 661-97925, in furtherance of drug trafficking crimes for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, as alleged in Count 1, and possession with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, as alleged in Count 7, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 9

(Possession of Firearms by Prohibited Person)

18 U.S.C. §§ 922(g)(1) and 924(a)(2)

On or about December 25, 2019, in Greene County, in the Western District of Missouri, the defendant, **LUCAS W. HAYNES**, then knowing he had previously been convicted of a crime

punishable by imprisonment for a term exceeding one year, knowingly possessed firearms, to wit: (1) a Glock, 19 Gen 4, 9mm semi-automatic pistol, bearing serial number BHKM793; (2) a Glock, 22, .40 caliber semi-automatic pistol, bearing serial number MCSD322; and (3) a Ruger, P90DC, .45 caliber semi-automatic pistol, bearing serial number 661-97925, and the firearms were in and affecting interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 10

(Attempted Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance Containing a Detectable Amount of Methamphetamine)

21 U.S.C. §§ 841(a)(1) and (b)(1)(A) and 846 and 18 U.S.C. § 2

Beginning on an unknown date, but at least as early as January 16, 2020, and continuing to on or about January 22, 2020, in Greene County, in the Western District of Missouri, and elsewhere, the defendants, **JESSIE R. THOMAS** and **JEREMY S. RUSSELL**, aiding and abetting each other, knowingly and intentionally attempted to possess, with intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) and 846, and Title 18, United States Code, Section 2.

COUNT 11

(Distribution of a Mixture or Substance Containing a Detectable Amount of Methamphetamine)

21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about January 17, 2020, in Greene County, in the Western District of Missouri, the defendant, **JEREMY S. RUSSELL**, knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 12

(Possession of Firearm in Furtherance of Drug Trafficking Crime)
18 U.S.C. § 924(c)(1)(A)

On or about January 23, 2020, in Greene County, in the Western District of Missouri, the defendant, **JEREMY S. RUSSELL**, did knowingly possess a firearm, to wit: a Ruger, Security 9, 9mm semi-automatic pistol, bearing serial number 381-77761, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, as alleged in Count 1, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 13

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about February 7, 2020, in Greene County, in the Western District of Missouri, the defendant, **JESSY K. SANCHEZ**, knowingly and intentionally possessed, with intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 14

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about February 13, 2020, in Greene County, in the Western District of Missouri, the defendant, **JESSIE R. THOMAS**, knowingly and intentionally possessed, with intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of

methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 15

(Possession with Intent to Distribute a Mixture or Substance
Containing a Detectable Amount of Heroin and/or Fentanyl)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about February 13, 2020, in Greene County, in the Western District of Missouri, the defendant, **JESSIE R. THOMAS**, knowingly and intentionally possessed, with the intent to distribute, any amount of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and/or N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

FORFEITURE ALLEGATION

The allegations contained in Count 1 of this Indictment are re-alleged and incorporated by reference for the purpose of alleging a forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

Upon conviction of the controlled substance offense alleged in Count 1 of this Indictment, the defendants, **MATTHEW D. CEPLECHA a.k.a. “SHIPWRECK”, JESSIE R. THOMAS, LUCAS W. HAYNES, ANTHONY J. KUREK a.k.a. “BONES”, JEREMY S. RUSSELL, HOLLI S. LAROSE, PHILLIP D. ROGERS, JESSICA A. RALLS, and JESSY K. SANCHEZ**, shall forfeit to the United States all property, real and personal, constituting, or derived from, proceeds obtained, directly and indirectly, as a result of the violations incorporated by reference in this Allegation and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violations alleged in Count 1 of this Indictment, including, but not limited to the following:

1. approximately \$2,509 in United States currency seized from **KUREK** on or about October 23, 2019;
2. approximately \$4,827 in United States currency seized from **LAROSE** on or about December 11, 2019;
3. approximately \$2,124 in United States currency seized from **HAYNES** on or about December 25, 2019;
4. approximately \$4,673 in United States currency seized from **KUREK** on or about February 5, 2020; and
5. a money judgment against each defendant individually representing the respective proceeds that each defendant obtained directly and indirectly as a result of his/her participation in the drug conspiracy alleged in Count 1.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All in accordance with Title 21, United States Code, Section 853, and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL

/s/ Pamela Carter-Smith

FOREPERSON OF THE GRAND JURY

/s/ Jessica R. Keller

JESSICA R. KELLER

Special Assistant United States Attorney

DATED: 3/11/2020
Kansas City, Missouri